

BOND SCHOENECK
& KING

600 Third Avenue, 22nd Floor | New York, NY 10016-1915 | bsk.com

MICHAEL COLLINS
mcollins@bsk.com
P: 646.253.2318
F: 646.253.2301

June 24, 2021

JUN 30 2021

VIA ELECTRONIC CASE FILING

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007-1312

JUN 30 2021

SO ORDERED

George B. Daniels
GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

Re: Amy Cohen v. College of Mount Saint Vincent, et al
Case No. 1:20-cv-09227-GBD
Letter Motion to Redact Plaintiff's Original Complaint

Dear Judge Daniels:

We represent Defendants College of Mount Saint Vincent ("CMSV") and Katie Gebhard ("Ms. Gebhard") in the above-referenced action. We write on Defendants' behalf to request that certain paragraphs of Plaintiff's original Complaint, that were inadvertently included, be redacted.

Plaintiff's original Complaint, filed on November 3, 2020, contained certain disparaging factual allegations (paragraphs 91-95 and 110) that Plaintiff's counsel acknowledged were included by mistake.

On April 16, 2021, Plaintiff filed an Amended Complaint without these mistaken allegations. However, the original Complaint containing the offensive allegations is still publicly available. These erroneous allegations malign Defendant Gebhard's reputation and will almost certainly adverse impact her future ability to work in college coaching and athletics.

Defendants request permission to file a redacted version of the original complaint, with paragraphs 91-95 and 110 blacked out from public view. Plaintiff's counsel has no opposition to this application.

Attached as Exhibit A is the redacted version of Plaintiff's original Complaint that we propose to substitute for the extant version (Docket #1).

Thank you for your consideration.

Hon. George B. Daniels
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Respectfully Submitted,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in cursive script, reading "Michael P. Collins". The signature is written in dark ink and is positioned below the firm name.

Michael P. Collins